



The Voice of Nursing Leadership™

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FCC Mail Room

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✓ Honorable Tom Wheeler, Chairman
Honorable Mignon Clyburn, Commissioner
Honorable Jessica Rosenworcel, Commissioner
Honorable Ajit Pai, Commissioner
Honorable Michael O'Rielly, Commissioner

C/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 Street, S.W.
Washington, DC 20554

Re: Ex Parte Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268

Dear Ladies and Gentlemen of the Commission:

The American Organization of Nurse Executives (AONE) with over 9,000 members in executive practice is very concerned about the FCC proposal to open the Wireless Medical Telemetry Service to unlicensed providers. We have been made aware of this issue through our subsidiary relationship with the American Hospital Association (AHA) and its professional engineering society, the American Society for Healthcare Engineering, that the Federal Communications Commission (FCC) is considering rules that would allow unlicensed TV White Space devices to operate on the same frequencies as those used in the Wireless Medical Telemetry Service (WMTS) that currently protect patients in our nation's hospitals, health systems and in other health settings. Wireless medical telemetry devices include heart, blood pressure, respiratory and fetal monitors that operate in a protected spectrum that was created by the FCC in 2000. This protected spectrum is now at risk because of the growing appetite for available wireless spectrum fueled by technology giants.

As health care professionals, we have embraced growth of wireless medical telemetry. It has provided a sustained level of comfort to the most complex and fragile patients whose very lives depend upon the constant monitoring and critical data they provide. Wireless telemetry has repeatedly served as advanced warning systems for life threatening conditions and a fail-safe system for busy providers who are dealing with multiple patient scenarios in critical and often chaotic settings. Its use has also become the standard of care expected in today's health care world.

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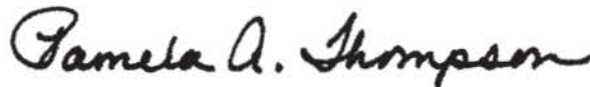
Under the proposed rules, telemetry that was protected from interference through the WMTS would now be opened to broadband wireless access across the internet. What this means is that wireless telemetry that is monitoring one or more critical heart patients could be impacted by radio interference from an external source. In lay terms, this means disruption of the signal such as a missed heartbeat, the lack of a respiration or a flat brain wave. Unfortunately, this very scenario became real when a Dallas TV station testing a digital television transmitter, knocked out of operation low-powered heart monitors at Baylor University Medical Center. This disruption was remedied and no patients were harmed but it is a poignant example of what could happen on a much larger scale if unlicensed devices are permitted to operate on the same frequencies as the WMTS.

Nurses serve on the front lines of ensuring patient safety. It is our concern that sharing previously protected spectrum with unlicensed devices operating on the same frequencies as the WMTS would endanger the very patients we are committed to protect. We ask that the Commission put patient safety first and reject any proposals that do not ensure interference free patient monitoring.

Sincerely,

A handwritten signature in cursive script that reads "Linda Burnes Bolton".

Linda Burnes Bolton, Dr. PH, RN, FAAN
President of AONE
Vice President, Chief Nursing Officer
Cedar Sinai Medical Center, Los Angeles

A handwritten signature in cursive script that reads "Pamela A. Thompson".

Pamela A. Thompson, MS, RN, CENP, FAAN
Chief Executive Officer, AONE
Sr. Vice President for Nursing/Chief Nursing Officer, AHA
Washington, DC